

The Honorable Marc L. Barreca
Chapter 11
Hearing: November 18, 2021 at 9:30
Reply: November 11, 2021

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re
TIMOTHY DONALD EYMAN,
Debtor.

NO. 18-14536-MLB

**DECLARATION OF DEBTOR IN
RESPONSE TO STATE OF
WASHINGTON'S MOTION FOR
APPOINTMENT OF A TRUSTEE**

Timothy D Eyman, duly sworn upon oath, deposes and states under penalties of perjury of the State of Washington, as follows:

I am the Debtor in these proceedings and make this Declaration as such.

I have reviewed the concurrently filed Debtor's Response to the State of Washington's Motion to Appoint a Trustee in my Chapter 11 and for other relief. The facts in the Response are true and correct to the best of my knowledge and belief, including the following specific facts stated therein:

I filed and confirmed a Chapter 11 Plan of Reorganization on April 8, 2020.

I do not dispute the State's claim that I have recently been unable to make the current payment(s) called for under the Plan, as I have run out of money to continue to fund the significant monthly payments in the Plan [*currently over \$11,400.00 a*

1 month, but going up to \$14,900.00 a month in January 2022.] Other than basic living
2 expenses, I have used the last of my financial resources to pay towards allowed claims
3 in these proceedings, including the aforementioned claims of the State and the
4 allowed administrative claims approved by the Court.

I have been reviewing various Options to seek modification of the Plan, but, at this time, due to the state trial court's restrictions on my political activities, including my fundraising activities, I cannot represent to the Court that I have any income in an amount(s) necessary to make a modified Plan feasible.

9 I have been consistent in making all plan payments until this last month and have
10 been filing post-confirmation reports since confirmation through the second quarter of
11 2021. (ECF #348). The third quarter report was just due at the end of October 2021.

12 Dated this 9th day of November, 2021.

/s/ Timothy Eyman 11/09/2021 9:52 pm

Timothy Eyman, Debtor

23 || Debtor's Declaration in Response to
Motion for Trustee

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